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April 29, 2003

The Honorable Ann Veneman
Secretary of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Veneman:

I am a licensed California veterinarian interested in the proposed Country of Origin Labeling, COOL, law. I would like to share with you my analysis of the 98 letters sent to the Agricultural Marketing Service, AMS, that were requested for comment on the COOL law.

These letters were from different segments of the agricultural industry whose comments could be generally described as "labeling and record keeping accuracy should be the responsibility of the supplier and this record keeping will increase costs."

So how big is the problem?

The National Farmers Union wrote. "According to the most recent data available from the Economic Research Service, the United States slaughtered just over 36 million head of cattle in 1999. In that same year, the United States imported approximately 1.9 million head of cattle from Mexico and Canada." This amounts to 5.2% of cattle slaughtered in the U.S.

Those opposed to COOL go to great length to make their case of increased costs but remain silent that their concerns would appear to be no more than 5%. In fact they admit that much of the 5% problem could be addressed by the simple expedient of scheduling foreign livestock on certain days, if not certain hours. A 40 hour week at 5% would mean a scheduling of two hours. The cattle will be slaughtered—it is just the when of it.

If the cattle are commingled, they are easily identified and separated by use of electronic methods including bar codes and/or radio frequency identification transponders. The use of such electronic devices are already useful in herd management programs. These devices are already proven to be cost effective in livestock production. How can you be opposed to something that makes you money?

The use of an individual animal identification program plugged into a data-collection reporting system will allow such a system to immediately isolate the source of any health risks. An electronic tracking system would help the USDA in controlling diseases as BSE (Mad Cow Disease) and Hoof and Mouth Disease. These electronic ear tag tracking devices will serve to safeguard both public health and increase public confidence in the beef supply. It will help the industry to quickly trace disease sources, focus remedial

action only where its needed and provide customers with additional assurances that the meat they are buying is safe.

In the discussion of animal health, it is fitting that the position of the American Veterinary Medical Association, AVMA, be put into the record as to food quality and safety. In 1993, the AVMA took the position as to the assurance of food quality and safety that there be "mandatory animal identification to enable tracking of animals through marketing channels to final products and trace back to origins."

In lieu of the threat of bio-terrorism, as well as foreign animal disease control, surveillance and prevention, bio-security of the national herd, identification of livestock vaccinated or tested under official disease control programs, official identification of animals in interstate or international commerce, accurate identification of blood and tissue specimens, improvement of laboratory diagnostic reporting capabilities, health status certification of herds, state and regions, and the ability to trace back to animal origins are reasons to support COOL law.

Government officials have an obligation and responsibility to protect the nation's food supply. The proposed COOL law will do just that.

Yours truly

A handwritten signature in black ink that reads "Wendell G. Peart". The signature is written in a cursive, flowing style.

Wendell G. Peart, DVM

Email wendell@volcano.net

Copies: Agricultural Marketing Service
Country of Origin Labeling Program
Office of Management and Budget
Clearance Officer
Interested Persons